

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SOLAS OLED LTD.,

*Plaintiff,*

v.

SAMSUNG DISPLAY CO., LTD., et al.,

*Defendants.*

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Case No. 2:19-CV-00152-JRG

**JOINT MOTION TO EXTEND DEADLINE**

Plaintiff Solas OLED Ltd. and Defendants Samsung Display Co., Ltd., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively “Defendants”) respectfully submit this Joint Motion to Extend Deadline.

Pursuant to the Docket Control Order entered on November 8, 2019 (ECF No. 43), the parties’ proposed Protective Order is due on November 13, 2019. Plaintiff and Defendants respectfully request that the Court enter an order granting a modest seven-day extension of the deadlines to submit a proposed protective order.

The parties’ proposal for the new deadline is as follows:

<b>Event</b>	<b>Original Deadline</b>	<b>Proposed New Deadline</b>
File proposed Protective Order	November 13, 2019	November 20, 2019

This Motion does not affect the parties’ November 13, 2019 deadline to comply with paragraphs 1 and 3 of the Discovery Order (initial and additional disclosures).

Good cause exists to modify the deadline addressed in this Motion because of the complexity of the case and the issues involved. The parties continue to meet and confer regarding their proposals for the joint filing and endeavor to eliminate or greatly narrow disputes for the

Court. Additionally, the case is in its early stages, and the parties agree that an extension of the above-listed deadline will not prejudice any party. Finally, the requested extension is not sought for the purpose of delay and will not require extension of any other deadlines.

Respectfully submitted,

Dated: November 13, 2019

/s/ Reza Mirzaie w/permission Andrea Fair

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Dated: November 13, 2019

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**CO., LTD., AND SAMSUNG ELECTRONICS  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on this the 13<sup>th</sup> day of November, 2019.

/s/ Andrea Fair  
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